UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION	MDL No. 1456
	Civil Action No. 01-CV-12257-PBS
THIS DOCUMENT RELATES TO:	Judge Patti B. Saris
State of Iowa v. Abbott Laboratories, et al.	

DEFENDANTS TEVA PHARMACEUTICALS USA, INC. AND NOVOPHARM USA, INC.'S UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM IN SUPPORT OF THEIR MOTION TO COMPEL

Pursuant to Rule 7.1(b)(3) of the Local Rules for the District of Massachusetts, Defendants Teva Pharmaceuticals USA, Inc. and Novopharm USA, Inc. (collectively, "Teva") seek leave of the Court to file the attached reply memorandum in support of their motion to compel. Counsel for the State of Iowa has indicated that the State of Iowa does not oppose Teva's request to file a reply memorandum. Teva's proposed reply memorandum is attached hereto as Exhibit A.

Dated: March 10, 2010

Respectfully submitted,

/s/ Jennifer G. Levy
Jennifer G. Levy (admitted *pro hac vice*)
Patrick M. Bryan (admitted *pro hac vice*)
Jason R. Parish (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
655 Fifteenth Street, NW
Washington, DC 20005
Tel: (202) 879-5000
Fax: (202) 879-5200

Attorneys for Teva Pharmaceuticals USA, Inc., Novopharm USA, Inc., Ivax Corporation, Ivax Pharmaceuticals, Inc., Sicor, Inc., and Barr Laboratories, Inc.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I certify that I conferred by e-mail with Jocelyn Normand, counsel for the State of Iowa, on March 3, 2010. Ms. Normand stated that the State of Iowa does not oppose Teva's motion for leave to file a reply memorandum.

/s/ Jason R. Parish
Jason R. Parish

CERTIFICATE OF SERVICE

I certify that on this 10th day of March, a true and correct copy of the foregoing DEFENDANTS TEVA PHARMACEUTICALS USA, INC. AND NOVOPHARM USA, INC.'S UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM IN SUPPORT OF THEIR MOTION TO COMPEL was served on all counsel of record by transmission to Lexis Nexis File & Serve.

/s/ Jason R. Parish
Jason R. Parish